

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

information associated with Discord, Inc.: username

"Fu#9282", with associated email address is

jbernier2005@hotmail.com (fully described in Attachment A)

Case No.22-1800M(NJ)

Matter No.: 2022R00459

WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of Wisconsin

(identify the person or describe the property to be searched and give its location):

See Attachment A. Over which this Court has jurisdiction pursuant to 18 U.S.C. §§ 2703 and 2711 and Federal Rule of Criminal Procedure 41.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal *(identify the person or describe the property to be seized)*:

See Attachment B.

YOU ARE COMMANDED to execute this warrant on or before November 17, 2022 *(not to exceed 14 days)*

☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Hon. Nancy Joseph

(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (*check the appropriate box*)

☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date of .

Date and time issued: 11/3/2022 @ 4:29 p.m.

City and state: Milwaukee, WI

the later specific date of _____

Nancy Joseph

Judge's signature

Hon. Nancy Joseph, U.S. Magistrate Judge

Printed name and title

Return		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name(s) of any person(s) seized:		
Certification		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 65%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div>		

Attachment A

Property to be Searched

This warrant applies to information associated with Discord, Inc.: username “**Fu#9282**”, with associated email address is **jbernier2005@hotmail.com** that is stored at premises owned, maintained, controlled, or operated by Discord, Inc. with company headquarters at 444 De Haro St., San Francisco, California.

Attachment B

Particular Things to be Seized

I. Information to be disclosed by Discord, Inc.

To the extent that the information associated with the account described in Attachment A is within the possession, custody, or control of Discord Inc., regardless of whether such information is located within or outside of the United States, and including any messages, records, files, logs, or information that have been deleted but are still available to Discord, Inc., or have been preserved pursuant to a request made, Discord, Inc. is required to disclose the following information to the government for each account or identifier listed in Attachment A, from April 2, 2022 to the present:

- a. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);
- b. The types of service utilized by the user;
- c. All records or other information stored by an individual using the account, including saved communications, image files or video files;
- d. All records pertaining to communications between Discord Inc. and any person regarding the account, including contacts with support services and records of actions taken.

The Provider is hereby ordered to disclose the above information to the government within 14 days of issuance of this warrant.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. 2252(a)(2), 2251(a), and 2252(a)(4)(B) involving the account described in Attachment A since April 1, 2022, including, for each account or identifier listed on Attachment A, information pertaining to the following matters:

- a. Images of child pornography, as defined in 18 U.S.C. 2256.
- b. Any record or document pertaining to the possession, receipt, and/or distribution of child pornography, as defined in 18 U.S.C. 2256.
- c. Any record or document identifying persons transmitting, through interstate commerce, including by computer, any visual depiction of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- d. Any record or document bearing on the receipt, shipment, orders, requests, trades, purchases or transactions of any kind involving the transmission through interstate commerce, including by computer, of any visual depiction of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.

- e. Any record or document pertaining to the preparation, purchase, and acquisition of names or lists of names to be used in connection with the receipt, distribution, trade, or transmission, through interstate commerce, of any visual depiction of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- f. Any record or document which lists names and addresses of any minor visually depicted while engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- g. Any record or document which shows the offer to transmit through interstate commerce any depictions of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. 2256.
- h. Any and all materials or items which are sexually arousing to individuals who are interested in minors, but which are not in and of themselves obscene or which do not necessarily depict minors involved in sexually explicit conduct. Such material is commonly known as, "child erotica" and includes written materials dealing with child development, sex education, child pornography, sexual abuse of children, incest, child prostitution, missing children, investigative techniques of child exploitation, sexual disorders, pedophilia, nudist publications, diaries, and fantasy writings. "Child erotica," may also include, in this context, sex aids and/or toys.
- i. Electronically stored communications or messages reflecting computer online chat sessions or e-mail messages with, or about, a minor that are sexually explicit in nature, as defined in 18 U.S.C. § 2256.
- j. The identity of the person(s) who created or used the account listed in Attachment A, including records that help reveal the whereabouts of such person(s).
- k. The identity of the person(s) who communicated with the account listed in Attachment A about matters relating to 18 U.S.C. 2252A(a)(2) and 2252A(a)(S)(B), including records that help reveal their whereabouts.
- l. Chats between the user and any minor.
- m. All other information or items that constitute fruits, contraband, evidence, or instrumentalities of violations of 18 USC § 2252, those violations involving the Subject Account and occurring since April 1, 2022.

This warrant authorizes a review of electronically stored information, communications, other records, and information disclosed pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts.

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Sarah Dettmering, being first duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with a certain Discord account that is stored at premises owned, maintained, controlled, or operated by Discord, Inc., a company headquartered in the San Francisco, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Discord, Inc. to disclose to the government records and other information in its possession, pertaining to the subscriber or customer associated with the account.

2. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since January 2018 and am currently assigned to the Milwaukee Division as a member of the Milwaukee Child Exploitation and Human Trafficking Task Force. My duties include investigating criminal violations relating to child sexual exploitation and child pornography. While employed by the FBI, I have investigated federal criminal violations related to child exploitation and child pornography. I have received training from the FBI specific to investigating child pornography and child exploitation crimes and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in various forms of media. As a result of my training, experience, and discussions with other law enforcement officers assigned

to investigate child pornography and child exploitation, I am familiar with methods by which electronic devices are used as the means for receiving, transmitting, possessing, and distributing images and videos depicting minors engaged in sexually explicit conduct. I have also received training and gained experience in interview and interrogation techniques with enhanced training specific to cybercrimes, social media search warrants, residential search warrants, interviews and interrogations of subjects of criminal investigations, electronic device identification and forensic review.

3. The facts contained in this affidavit are known to me through my personal knowledge, training, and experience, and through information provided to me by other law enforcement officers, who have provided information to me during the course of their official duties and whom I consider truthful and reliable.

4. Based upon the information described below, I submit that probable cause exists to believe that the user of the Discord account in the name of "Fu#9282" (the SUBJECT ACCOUNT) has committed the crime of attempted production of child pornography, in violation of Title 18, United States Code, Section 2251(a), receipt/distribution of child pornography in violation of Title 18, United States Code, Section 2252(a)(2), and possession of child pornography in violation of Title 18, United States Code, Section 2252(a)(4)(B). I further submit that evidence relating to this crime, more particularly described in Attachment B, can be found in the contents of the SUBJECT ACCOUNT, more particularly described in Attachment A. This affidavit is

intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. 2711. 18 U.S.C. 2703(a), (b)(1)(A), & (c)(l)(A). Specifically, the court is "a district court of the United States, that has jurisdiction over the offense being investigated." 18 U.S.C. 2711(3)(A)(i).

DEFINITIONS

6. The following definitions apply to the Affidavit and Attachment B to this Affidavit:

a. "Child Pornography" is defined in 18 U.S.C. § 2256 as any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct. Child pornography is also commonly referred to as Child Sexual Abuse Material, or "CSAM."

b. "Chat," as used herein, refers to any kind of text communication over the Internet that is transmitted in real-time from sender to receiver. Chat messages

are generally short in order to enable other participants to respond quickly and in a format that resembles an oral conversation. This feature distinguishes chatting from other text-based online communications such as Internet forums and email.

c. The “Internet” is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

d. “An Internet Protocol address” (IP address) is a unique numeric address used by internet-enabled electronic storage devices to access the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every electronic storage device attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that electronic storage device may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static that is, long-term IP addresses, while other computers have dynamic that is, frequently changed IP addresses.

e. “Minor” means any person under the age of eighteen years. See 18 U.S.C. § 2256(1).

f. The terms “records,” “documents,” and “materials” include all information recorded in any form, visual or aural, and by any means, whether in

handmade form (including writings and drawings), photographic form (including prints, negatives, videotapes, motion pictures, and photocopies), mechanical form (including printing and typing) or electrical, electronic or magnetic form (including tape recordings, compact discs, electronic or magnetic storage devices such as hard disks, CD-ROMs, digital video disks (DVDs), Personal Digital Assistants (PDAs), Multi Media Cards (MMCs), memory sticks, smart cards, or electronic notebooks, as well as digital data files and printouts or readouts from any magnetic, electrical or electronic storage device).

g. “Sexually explicit conduct” means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person. See 18 U.S.C. § 2256(2).

h. “Visual depictions” include undeveloped film and videotape, and data stored on a computer disk or by electronic means, which is capable of conversion into a visual image. See 18 U.S.C. § 2256(5).

i. “Website” consists of text pages of information and associated graphic images. The textual information is stored in a specific format known as Hyper-Text Mark-up Language (HTML) and is transmitted from the web servers to various web clients via Hyper-Text Transport Protocol.

BACKGROUND ON DISCORD

7. Discord is a messaging platform where millions of users from around the world connect with each other through chat, voice, and video. Discord has both a desktop (PC, Mac, Linux) application and a mobile (iOS, Android) application, and the service can also be accessed from the website directly at www.discordapp.com.

8. In order to use the services, users need to create an account by selecting a username. Once they've made their account, users can create a server and invite their friends to join it with an invite link, or they can join an existing server. Servers are broken down into sub-categories or "channels" where users can connect with each other by either chatting or calling. Users can also communicate through direct messages, which are private chats created between 1-10 users.

9. To create a Discord account, the user is also required to provide an email address which is verified by Discord.

10. Providers like Discord, Inc. typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account, and other log files that reflect usage of the account. In addition, providers often have records of the Internet Protocol address ("IP address") used to

register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the SUBJECT ACCOUNT.

11. In some cases, Discord users will communicate directly with a provider about issues relating to their account, such as technical problems, billing inquiries, or complaints from other users. Providers typically retain records about such communications, including records of contacts between the user and the provider's support services, as well records of any actions taken by the provider or user as a result of the communications.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

12. On or about September 21, 2022, FBI Kansas City received a report of a subject engaged in the production of child sexual abuse material (CSAM). The subject, Eduardo Gonzales, was identified as a family friend who had sexually abused the complainant's 17-year-old daughter (Victim 1) since she was in approximately the sixth grade.

13. On or about September 22, 2022; Victim 1 was interviewed and disclosed that Gonzales would force Victim 1 to dress in different lingerie and then Gonzales would take pictures of Victim 1.

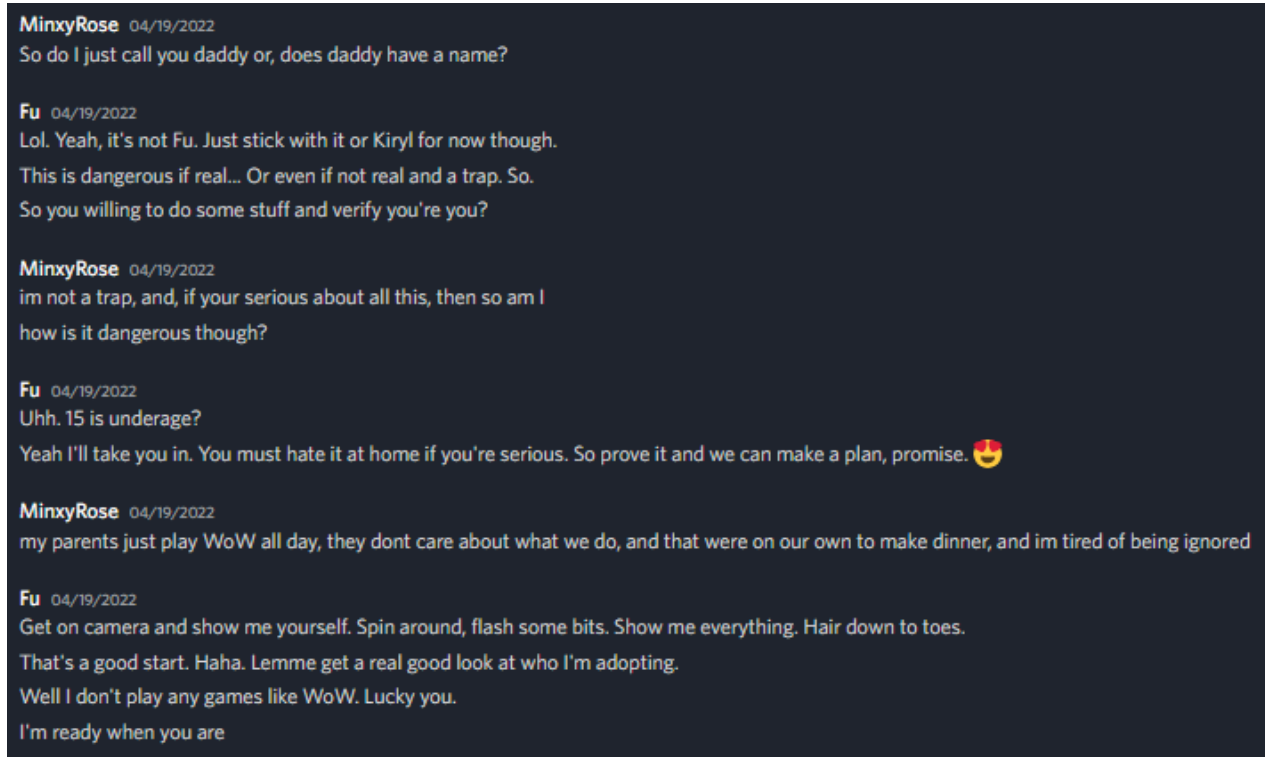
14. On or about September 22, 2022, Gonzales was interviewed, and admitted that he bought Victim 1 lingerie and would then take pictures of her wearing it. Gonzales disclosed that this then progressed to Gonzales taking naked pictures of Victim 1. Gonzales also disclosed that Gonzales operated a Discord account where Gonzales pretended to be Victim 1 in order to “catch” other users who were interested in underage girls.

15. On or about September 22, 2022, Gonzales provided written consent for FBI Kansas City to assume his online identity pertaining to multiple accounts. This included Gonzales’ Discord account, “MinxyRose#0054” (hereinafter “MinxyRose”). This is the account that Gonzales used when he pretended to be Victim 1.

16. On or about October 4, 2022 an FBI Task Force Officer, operating in an online undercover capacity, (hereinafter “FBI-OCE”), logged into the Discord account MinxyRose and directed his investigative focus to Discord user “Fu#9282” (hereinafter the “SUBJECT ACCOUNT”) because the SUBJECT ACCOUNT was identified as an account exchanging CSAM and discussing possibly meeting MinxyRose, who the user of the SUBJECT ACCOUNT believed to be 15 years old.

17. The conversation between MinxyRose and the user of the SUBJECT ACCOUNT, that FBI-OCE was able to see once he logged on, started on or about April 19, 2022. At that time, Gonzales was operating the MinxyRose account. It is not known at this time if there were any prior communications between the two accounts.

18. On or about April 19, 2022, the following chat exchange took place between Gonzales as MinxyRose, and the user of the SUBJECT ACCOUNT¹:



MinxyRose 04/19/2022
So do I just call you daddy or, does daddy have a name?

Fu 04/19/2022
Lol. Yeah, it's not Fu. Just stick with it or Kiryl for now though.
This is dangerous if real... Or even if not real and a trap. So.
So you willing to do some stuff and verify you're you?

MinxyRose 04/19/2022
im not a trap, and, if your serious about all this, then so am I
how is it dangerous though?

Fu 04/19/2022
Uhh. 15 is underage?
Yeah I'll take you in. You must hate it at home if you're serious. So prove it and we can make a plan, promise. 🍷

MinxyRose 04/19/2022
my parents just play WoW all day, they dont care about what we do, and that were on our own to make dinner, and im tired of being ignored

Fu 04/19/2022
Get on camera and show me yourself. Spin around, flash some bits. Show me everything. Hair down to toes.
That's a good start. Haha. Lemme get a real good look at who I'm adopting.
Well I don't play any games like WoW. Lucky you.
I'm ready when you are

19. In these messages, the user of the SUBJECT ACCOUNT is confirming that the user believes MinxyRose to be 15 years old.

20. The user of the SUBJECT ACCOUNT is also requesting that MinxyRose “flash some bits. Show me everything.” Subsequent to that message from the user of the SUBJECT ACCOUNT, MinxyRose sent a video which showed Victim 1, from the waist up, nude and exposing Victim 1’s breasts to the camera.

¹ This is a screen capture of the messages between MinxyRose and Fu taken by FBI-OCE subsequent to the account takeover. No times were shown in the screen capture.

21. On multiple occasions the user of the SUBJECT ACCOUNT made reference to MinxyRose being underage, or a kid. These messages show that the user of the SUBJECT ACCOUNT believed that the user was chatting with a minor. These messages and the date they were sent are below²:

Fu 04/26/2022
Underage ho.

Fu 04/22/2022
You'd be getting some wakeup dick right now slut.
Rolled over on your belly and pounded in that chubby kid pussy.

Fu 05/09/2022
Another teen pregnancy just waiting to happen, you.
Pump you full of nut
Any time, [REDACTED]

Fu 06/07/2022
Pound you with some big adult dick if you were here, kid.
Make you fucking pregnant bitch

Fu 06/07/2022
Hey whore
Been wanting to rape you for weeks now.
Pound your ass and pussy. Cream your throat. Suck your toes. Give you a big baby bump.

Fu 10/04/2022
Want your underage holes, [REDACTED] Speak up again soon
If you mean it and still look good to fuck you can come live here next month. ❤️

Fu 10/17/2022
Wish you were here, you slut.
I'd put you on your back and creampie your kiddy cunt right now.

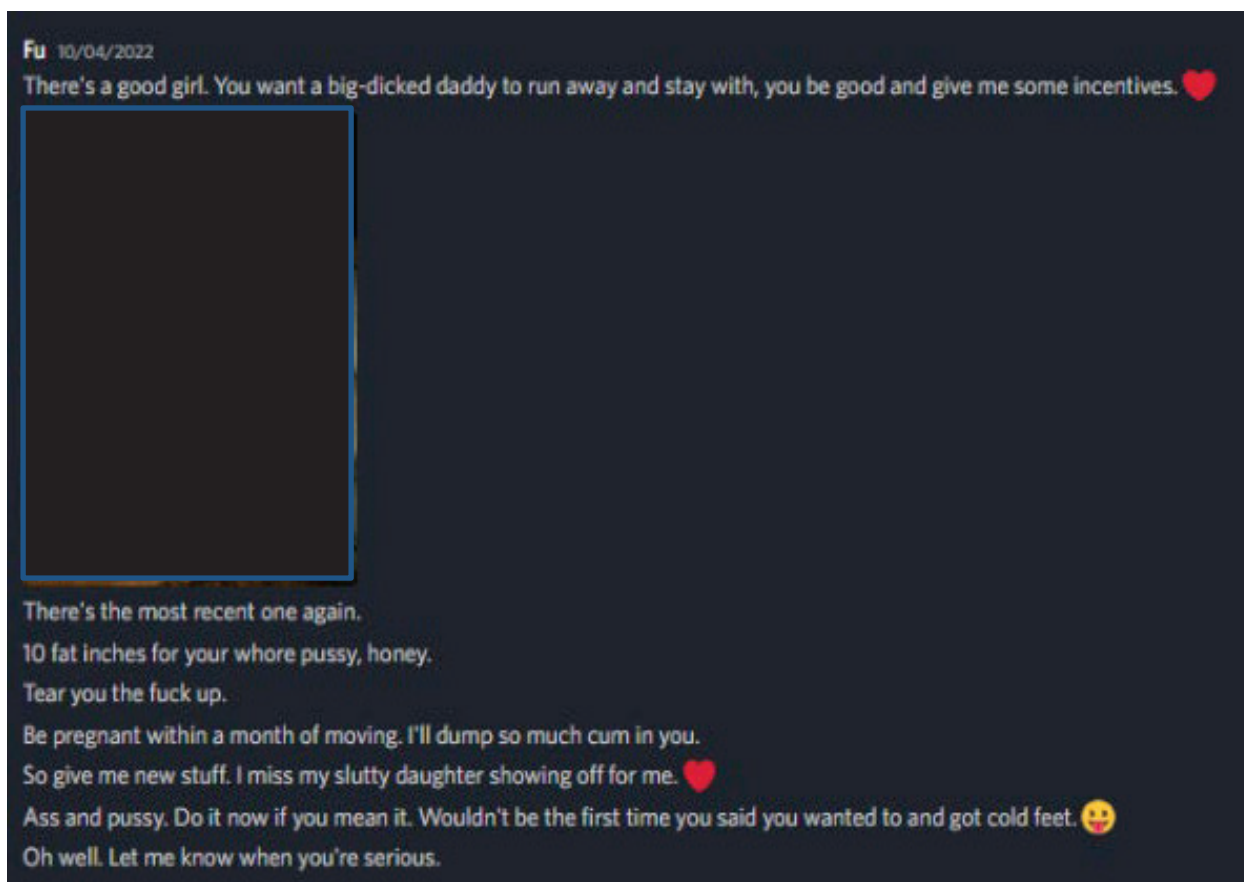
² The name of Victim 1 was used in the chats, but it has been redacted from these messages to protect the identity of Victim 1.

22. On or about May 31, 2022, the user of the SUBJECT ACCOUNT sent three images to MinxyRose. The first two images were sexually explicit images of a female kneeling down with her buttocks towards the camera and her nude anus exposed. The third image, consistent with the definition of CSAM, showed Victim 1 lying on her back on a bed, her hair in pigtails, nude except for white stockings, with her legs spread and her nude vagina exposed to the camera. After the first image the user of the SUBJECT ACCOUNT sent a message which stated "Fat whore. Knock you the fuck up." After the third image the user of the SUBJECT ACCOUNT sent a message which stated "Sailor moon³ looking bitch begging for it. What a whore." During this chat exchange the user of the SUBJECT ACCOUNT sent at least one image consistent with the definition of child pornography.

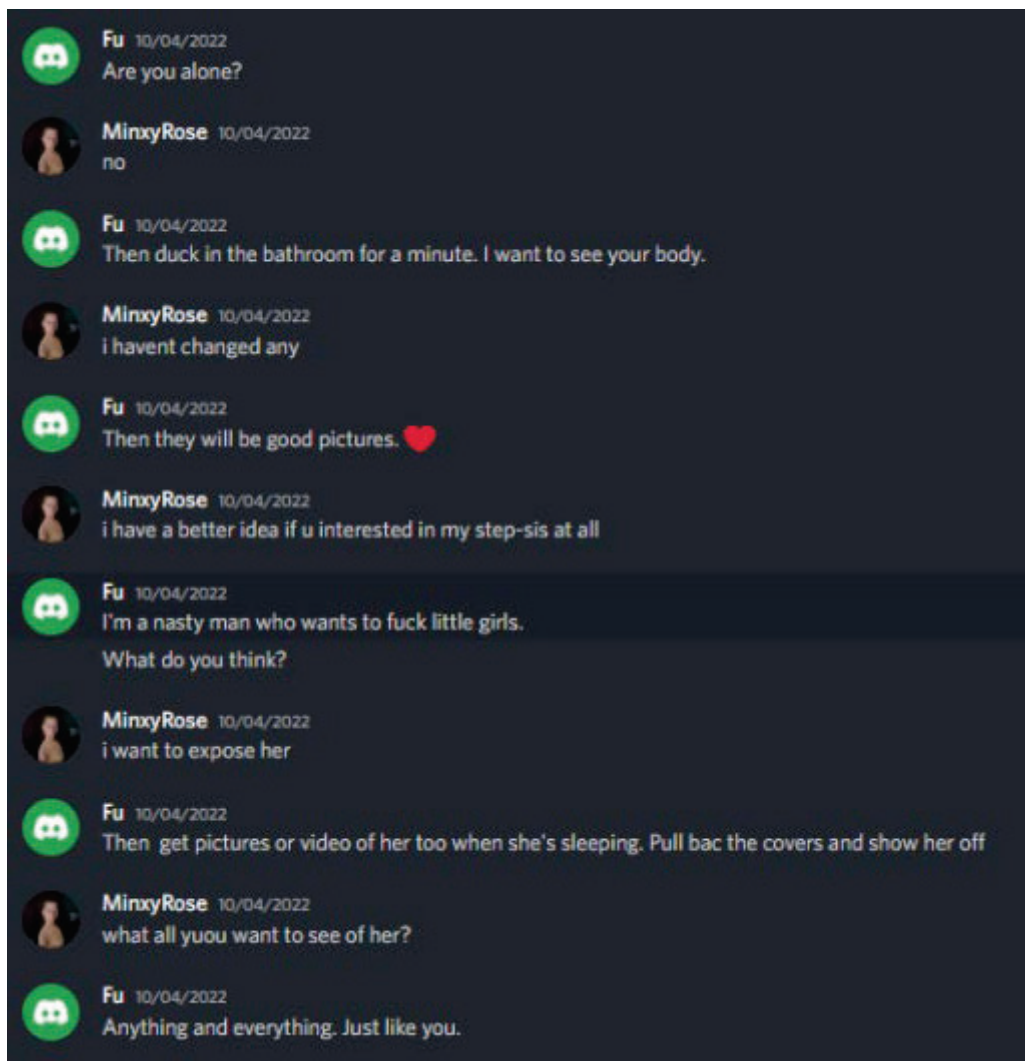
23. On multiple occasions the user of the SUBJECT ACCOUNT requested that MinxyRose send the user nude images. One example of a message where the user of the SUBJECT ACCOUNT requested nude images is below⁴:

³ Sailor moon is a popular female cartoon character who wore her hair in pigtails.

⁴ The redacted portion of this chat is a zoomed in image of an erect male penis.



24. In another instance while FBI-OCE was operating MinxyRose, MinxyRose told the SUBJECT ACCOUNT that MinxyRose had an 8-year-old stepsister. After this, the user of the SUBJECT ACCOUNT told MinxyRose to take pictures of the 8-year-old. The messages are below:



25. These chats show that the user of the SUBJECT ACCOUNT, knew that MinxyRose was a minor, received sexually explicit images and videos from MinxyRose, and requested that MinxyRose self-produce further sexually explicit images and videos of MinxyRose and the 8-year-old stepsister.

26. Through my training and experience in investigations pertaining to attempted production of child pornography/CSAM via online chats, I know that it is

likely if the subject has attempted production with one victim, they will have attempted it with other victims as well.

27. This shows there is probable cause to believe that evidence of violations of federal law will be found within the SUBJECT ACCOUNT.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

28. According to Discord, Inc.'s law enforcement guide, the following items are available with a search warrant: Basic subscriber data, the unique User ID number of the account that is assigned by Discord, registration date and time for the account, registration IP address of the account, email address provided by the user, user's current username and tag number, if the user is a paid subscriber, limited billing information, IP addresses and session start-timestamps, Discord stored messages and attachments that users send to each other in text channels, whether it's in a server or in direct messages.

29. As explained herein, information stored in connection with a Discord, Inc. account may provide crucial evidence of the "who, what, why, when, where and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a messaging application user's communication logs, stored electronic communications, and other data retained by Discord, Inc., can indicate who has used or controlled the Discord account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a

residence. Discord account activity can show how and when the account was accessed or used. For example, as described herein, Discord, Inc. logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Discord access, use, and events relating to the crime under investigation. Additionally, Discord account activity may provide relevant insight into the Discord account owner's state of mind as it relates to the offense under investigation. For example, information in Discord chats may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

30. Therefore, the computers of Discord are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Discord, such as account access information, transaction information, and other account information.

SEARCH PROCEDURE

31. From my training and experience, I know that Discord cannot, on its own, identify individual items of potential evidentiary value within user's account.

Accordingly, this search warrant anticipates a multi-step approach for serving the warrant, obtaining responsive information from Discord, Inc., and then searching the responsive information to identify potential evidence.

32. Pursuant to the Electronic Communications Privacy Act, in particular 18 U.S.C. 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), I will serve the warrant on Discord, Inc. Discord, Inc. will, at a later date, disclose to the government copies of the records and other information (including the content of communications and stored data) particularly described in Attachment B. Once received, the government will search the records and information provided by Discord, Inc. to locate items and evidence relating to the crimes under investigation, specifically Title 18 U.S.C. 2252, including:

- a. Messages discussing child pornography;
- b. Photographs, videos, or images of child pornography
- c. Chats discussing child pornography
- d. Chats between the user and any minor;
- e. Chats between the user and any known or potential victims
- f. Evidence indicating how and when the account was accessed or used, to determine the chronological context of account access, use, and events relating to the crime under investigation and to the account owner;
- g. Evidence indicating the account owner's state of mind as it relates to the crime(s) under investigation;
- h. All items tending to show who was in control of the account and who used or owned the device(s) associated with this account including email addresses, images, recovery emails, cookies data, geolocation data, documents, IP logs, and other communication records; and

- i. All other information or items that constitute fruits, contraband, evidence, or instrumentalities of violations of 18 USC § 2252, those violations involving the Subject Account and occurring since April 1, 2022.

CONCLUSION

23. Based on the forgoing, I request that the Court issue the proposed search warrant. Because the warrant will be served on Discord, Inc., who will then compile the requested records at a time convenient to it, there exists reasonable cause to permit the execution of the requested warrant at any time in the day or night.